Message

From: Kozlowski, Nicole [Nicole.Kozlowski@dep.nj.gov]

Sent: 6/15/2020 12:34:57 PM

To: AccardiDey, AmyMarie [amymarie.accardi-dey@wsp.com]; Anne Hayton [Anne.hayton@dep.nj.gov]

CC: Bounkhay, Mina [mina.bounkhay@wsp.com]; Smeraldi, Josh [Smeraldi.Josh@epa.gov]

Subject: Re: Maps for review Riverside Compliance Averaging

Thanks, AmyMarie and Mina, for getting these figures out ahead of time.

See you all at 2.

-NK

Nicole Kozlowski

Research Scientist

Bureau of Environmental Evaluation & Risk Assessment Site Remediation & Waste Management Program New Jersey Department of Environmental Protection 401 East State Street; 5th Floor

Mailcode: 401-05W

PO Box 420

Trenton, NJ 08625-0420

P: (609) 292-1871 *periodically checking messages remotely

F: (609) 633-1454

From: AccardiDey, AmyMarie <AmyMarie.Accardi-Dey@wsp.com>

Sent: Monday, June 15, 2020 7:00 AM

To: Hayton, Anne <Anne.Hayton@dep.nj.gov>; Kozlowski, Nicole <Nicole.Kozlowski@dep.nj.gov> **Cc:** Bounkhay, Mina <mina.bounkhay@wsp.com>; Smeraldi, Josh <Smeraldi.Josh@epa.gov>

Subject: [EXTERNAL] Maps for review Riverside Compliance Averaging

Anne and Nicole – Attached are maps for our conference call today at 2pm (eastern). As an example, we examined Arsenic and Benzo[a]pyrene for Compliance Average. Please note the following:

ARSENIC and BAP

- Functional Area are shown in figures as blue lines. Areas are written on bottom of square.
- Both RI and Historical data are presented.
- "Surface Soil" is defined as field samples with the top of the soil interval less than 2 feet bgs (so 1.5-3.5 ft interval is considered "surface").
- Blue symbols represent an exceedance relative to NJDEP NRDCSRS.
- The GREEN lines are WSP's attempted delineation within the functional area (and around buildings). <u>Note that</u> very few delineations are complete or correctly delineated.
- The PINK lines are PPG's delineations as presented in Appendix A.

LEAD

- Both RI and Historical data are presented.
- Maximum Lead concentration per boring is presented and compared to the PRG of 800 mg/kg.
- The GREEN lines are WSP's proposed Single Point Compliance regardless of functional area boundaries.
- The PINK and PURPLE lines are PPG's delineation as presented in Appendix A.

KEY TOPICS TO DISCUSS

- Compliance Averaging is not working well for this Site (suggest removing it from FS).
- Need to discuss Single Point Compliance for FS cost estimate with wording that delineation will be completed during the remedial design.
- Does NJDEP agree with maximum concentration per boring with comparison to ARARs? Dividing "surface" and "subsurface" may have limitations.

Regards AM and Mina

AmyMarie Accardi-Dey, PhD, PG, CPC Director | Water & Environmental Systems



Phone: 1-914-620-5110 Office: 1-914-798-3710

Email: AmyMarie.Accardi-Dey@wsp.com

WSP USA 565 Taxter Road, Suite 510 Elmsford, New York 10523

wsp.com

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